



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

May 31, 1995

CERTIFIED MAIL: P-243-066-969
RETURN RECEIPT REQUESTED

Robert L. Coombes, Sr.
Crown City Plating Co.
4350 Temple City Blvd.
El Monte, CA 91731

Re: Unilateral Administrative Order No. 95-17
San Gabriel Valley Superfund Sites Areas 1-4

Dear Mr. Coombes, Sr.:

The enclosed Administrative Order, No. 95-17, requires you to conduct a Partial Remedial Investigation in the El Monte Operable Unit of the San Gabriel Valley Superfund Sites. Although the United States Environmental Protection Agency ("U.S. EPA") acknowledges that you have taken extra effort at your processing area to protect the environment, U.S. EPA believes that activities at your facility, predominantly at the drum storage area, have resulted in contamination in the unsaturated zone beneath this property and in the underlying ground water. U.S. EPA also recognizes your involvement in U.S. EPA's Common Sense Initiative ("CSI") and your proposed project in support of this initiative. U.S. EPA Region IX supports the goals of the CSI. However, your potential involvement in the CSI does not release you from your Superfund responsibility in the regional groundwater cleanup and the role you have to share with the other Noticed-potentially responsible parties in the El Monte Operable Unit ("EMOU") Remedial Investigation/Feasibility Study ("RI/FS").

On October 7, 1994, U.S. EPA issued you a Special Notice Letter pursuant to the Comprehensive Environmental Response, Compensation and Liability Act, as amended, 42 U.S.C. § 9601 et seq. ("CERCLA") for the EMOU RI/FS. Pursuant to this Special Notice Letter, a Good Faith Offer to complete the tasks set forth in the Special Notice Letter was due on or before December 6, 1994. Crown City Plating Company ("CCPC") was part of the North El Monte Community Task Force ("NEMCTF") which submitted a proposed Good Faith Offer. Pursuant to CERCLA section 122, 42 U.S.C. § 9622, an Administrative Order on Consent ("AOC") was to

be signed on or before January 13, 1995. U.S. EPA Region IX provided an extension to this date until March 15, 1995. While CCPC submitted a signature page for the AOC, CCPC was not a member of the NEMCTF at the time of such submission, accordingly CCPC's submission could not be viewed as an indication of CCPC's willingness to perform the RI/FS activities. Based on CCPC's failure to participate in the AOC and RI/FS to date, U.S. EPA is ordering you to conduct a Partial Remedial Investigation pursuant to Section 106 of CERCLA.

As stated numerous times in the past, U.S. EPA still believes that the best course is for you to join the NEMCTF and receive the benefits of economy of scale for the work items in the RI/FS, receive the legal benefits which accompany the Administrative Order on Consent, and be involved in developing the remedy for regional groundwater cleanup. U.S. EPA Region IX understands that industry representatives from the Metal Finishing Sector involved in CSI, as well as U.S. EPA representatives directly responsible for the implementation of CSI in the Metal Finishing Sector, have likewise discussed the benefits of you working with the NEMCTF. As was stressed by these representatives, it is by being a member of the NEMCTF that your proposals under CSI will have a heightened chance for success; acting alone, implementation of your proposal is much less likely.

The El Monte Operable Unit consists of large areas of contaminated groundwater resulting from multiple sources. U.S. EPA has determined that the most expedient way of addressing the operable unit-wide problem is to order CCPC, as the only Noticed-potentially responsible party ("PRP") who has failed to submit a binding signature to the AOC, to investigate a portion of the Operable Unit that was required in EPA's Statement of Work (SOW). This portion of the remedial investigation will allow you to perform your share of the regional work which is fair to both you and the NEMCTF.

Please be aware that, pursuant to Section XXI of this Order, you must provide EPA with written notice of your intent to comply with the Order within two (2) days of the Effective Date of this Order. If EPA does not receive such notification, you will be deemed in violation of the Order. Pursuant to 42 U.S.C. § 9607(c)(3), if EPA conducts the Remedial Investigation because you choose not to, you may be liable for up to three (3) times the cost incurred by EPA.

As set forth in Section XXII of this Order, if you desire a conference to discuss your implementation of the Order with EPA, you must make a request within three (3) days of the date of receipt of this Order, and the conference shall occur within three (3) days of the request. The request for a conference must be made by telephone, followed by written confirmation, to Mark Klaiman, Assistant Regional Counsel, 75 Hawthorne Street, San Francisco, California 94105. Mr. Klaiman may be reached at (415) 744-1374.

Pursuant to Section XXV of this Order, this Order is effective three (3) calendar days following receipt by Respondent unless a conference is requested. If such a conference is requested, the Order shall be effective the second (2nd) day following the day of such conference unless modified in writing by U.S. EPA.

Respectfully,

Jeffrey Zelikson, Director
Hazardous Waste Management Division

Enclosure

cc: Robert Benson, Common Sense Initiative
Mark Klaiman, U.S. EPA, Office of Regional Counsel
Bella Dizon, U.S. EPA
Robert Ghirelli, California Regional Water Quality Control
Board, Los Angeles
Kenneth Russo, Chairperson, NEMCTF

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SURNAME	BGD	MOK	ME	HRM/AT		
DATE	5-31-95	31 May '95	5/31/95	5/21/95		

U.S. EPA CONCURRENCES

OFFICIAL FILE COPY

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9

In the matter of:

San Gabriel Valley Superfund Sites,
Areas 1-4

RESPONDENT:

Crown City Plating Company
4350 Temple City Blvd.
El Monte, CA 91731

U.S. EPA Docket
No. 95-17

Proceeding Under Section 106(a) of the
Comprehensive Environmental Response,
Compensation, and Liability Act of 1980
(42 U.S.C. § 9606(a)).

UNILATERAL ADMINISTRATIVE ORDER FOR
PARTIAL REMEDIAL INVESTIGATION

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I. AUTHORITY

This Administrative Order ("Order") is issued on this date pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. §106(a), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA"). The President delegated this authority to the Administrator of the United States Environmental Protection Agency ("EPA" or "Agency") by Executive Order 12580, January 23, 1987, 52 Fed. Reg. 2923, and further delegated it to the Assistant Administrator for Solid Waste and Emergency Response and the Regional Administrators by EPA Delegation Nos. 14-8-A and 14-14-C. This authority has been redelegated to the Director, Hazardous Waste Management Division, EPA, Region 9 ("Director") by Region 9 Delegations 1290.41 and 1290.42

II. PARTIES BOUND

A. This Order shall apply to and be binding upon Crown City Plating Company ("CCPC" or "Respondent"), its agents, successors and assigns. No change in ownership or operational status will alter Respondent's obligations under this Order. Respondent shall provide a copy of this Order to all contractors, subcontractors, laboratories, and consultants which are retained by Respondent to perform the work required by this Order, within five (5) days after the Effective Date of this Order or within five (5) days of retaining their services. Notwithstanding the terms of any contract or agreement, Respondent is responsible for

compliance with this Order and for ensuring that their employees, contractors, and agents comply with this Order.

B. Respondent shall not convey any title, easement, or other interest it may have in any property comprising the Facility, and Respondent shall not convey any interest in the company, without a provision permitting the continuous implementation of the provisions of this Order. Respondent shall provide a copy of this Order to any subsequent owner(s) or successor(s) before any ownership rights are transferred. Respondent shall advise U.S. EPA six (6) months in advance of any anticipated transfer of interest.

III. DEFINITIONS

A. The San Gabriel Valley Superfund Sites, Areas 1-4 are located in suburban Los Angeles County in Southern California. There are four areas of groundwater contamination listed on the National Priorities List (San Gabriel Valley Areas 1-4). Included within the sites are significant portions of the cities of La Puente, City of Industry, Azusa, Baldwin Park, Irwindale, West Covina, El Monte, South El Monte, Monrovia, Arcadia, Rosemead, and Alhambra.

B. The San Gabriel Valley Area 1 Superfund Site was placed on the National Priorities List due to contamination of groundwater by tetrachloroethene ("PCE"), trichloroethylene ("TCE") and other organic solvents. The San Gabriel Valley Area 1 Superfund Site includes an area of groundwater contamination located in the cities of El Monte, South El Monte, Temple City and Rosemead. The Respondent's Facility is located in the San

Gabriel Valley Area 1 Superfund Site.

C. The CCPC Facility (the "Facility") is the property located at 4350 Temple City Blvd. El Monte, CA 91731. CCPC owns this property and has operated at this location since 1956.

D. Respondent's facility and every location at which work is being performed pursuant to this Order shall be referred to as the "Site" for the purposes of this Order.

E. "Day" means calendar day unless otherwise noted in this Order.

IV. FINDINGS OF FACT

A. CCPC is a metal plating facility and has operated at 4300-4350 Temple City Boulevard in El Monte, California since 1956. CCPC owns most of the property except for a small section at the southernmost end of the property which Crown City leases (since 1977) from Southern Pacific Transportation Company.

B. Chemical use at the Facility includes 1,1,1-trichloroethane (TCA), toluene, wash thinner, cutting oil, sulfuric acid, nitiric acid, and sodium hydroxide.

C. It was observed during an inspection by the Regional Water Quality Control Board - Los Angeles ("RWQCB") on May 13, 1987 that there had been a solvent spillage southeast of the loading dock located at the southern end of the Facility, as evidenced by discolored and degraded asphalt.

D. Soil samples taken during the Phase I Subsurface Investigation on Oct 16, 1987 by EMCON Associates at the drum storage yard at the southeast corner of the Facility revealed TCA at 3000 ug/kg and tetrachloroethylene (PCE) at 300 ug/kg at 5'

below ground surface ("bgs").

E. Soil samples taken during the Phase II Subsurface Investigation of the Facility on January 24, 1989 by EMCON Associates showed TCA up to 42 ug/kg at 40' bgs from a boring which was converted to monitoring well (E-1) at the drum storage yard. Soil samples taken around the same general area showed TCA up to 180 mg/kg at 5' bgs and TCE up to 61 ug/kg at 5' bgs. Groundwater sample from E-1 showed TCA at 45 ug/l, PCE at 150 ug/l, trichloroethylene (TCE) at 300 ug/l and 1,1,-dichloroethene (DCE) at 15 ug/l.

F. During the Phase III Subsurface Investigation of the Facility on January 23 and 24, 1990 by Environmental Solutions Inc., soil samples collected from soil boring E-2 located at the Facility boundary to the east of E-1 showed TCE at 11 ug/kg at 40' bgs and soil sample from soil boring E-3 located at the north Facility boundary showed TCE at 8 ug/kg at 80' bgs. These borings were converted to monitoring wells.

G. Groundwater samples collected on February 2, 1990 showed TCE at 220 ug/l, 2000 ug/l, and 9 ug/l from E-1, E-2, and E-3 respectively.

H. First phase soil gas survey performed by Inland Empire Environmental Services ("IEES") in April, 1993 showed PCE at 6.4 ug/l at soil gas point #6 (SG-6) located right next to E-1, TCE and PCE at 7.4 ug/l and 12.4 ug/l respectively at SG-3 located about 40' north west of E-1, and TCE and PCE at 7.5 ug/l and 4.3 ug/l respectively at SG-4 located right next to SG-3.

I. The second phase soil gas survey performed by IEES in

September 1993 showed the highest concentration of PCE points cc-22 and cc-23 at the paint storage area. TCE and TCA were also detected at cc-22 and cc-23.

J. The multi-depth soil gas survey performed by Environmental Support Technologies, Inc. on February 8 and 9, 1995 showed PCE at 81 ug/l, TCE at 24 ug/l, DCE at 148 ug/l, and TCA at 344 ug/l at the drum storage area at 35' bgs. PCE at 30 ug/l was detected at 40' bgs southwest of the maintenance building and TCE at 12 ug/l was detected at 20' bgs south of the maintenance building.

K. CCPC received Notice of Potential Liability ("General Notice") for the San Gabriel Valley Superfund Sites, Areas 1-4, on May 7, 1990. CCPC was issued Special Notice for the El Monte RI/FS on October 7, 1994 and was received on October 11, 1994 (Certified Mail Receipt No. P 104 938 520). Pursuant to the Special Notice, as extended by U.S. EPA, an AOC to complete the tasks set forth in the Statement of Work was due on or before March 15, 1995. CCPC has failed to submit a binding signature to the AOC.

V. CONCLUSIONS OF LAW

A. Respondent's site is a "facility" as defined in Section 101(9) of CERCLA, 42 U.S.C. §9601(9).

B. Respondent is a "person" as defined in Section 101(21) of CERCLA, 42 U.S.C. §9601(21).

C. Analyses of samples collected during past investigations at Respondent's facility indicate the presence of volatile organic compounds including TCE, PCE, and TCA. These

substances are "hazardous substances" as defined in Section 101(14) of CERCLA, 42 U.S.C. §9601(14).

D. The past, present, and potential migration of hazardous substances from Respondent's facility constitutes an actual or threatened "release" as defined in Section 101(22) of CERCLA, 42 U.S.C. §9601(22).

E. Respondent either owns or operates a facility where hazardous substances have come to be located. Respondent is a potentially responsible party as defined in Section 107(a) of CERCLA, 42 U.S.C. §9607(a).

VI. DETERMINATIONS

A. The Director, Hazardous Waste Management Division has determined that an actual or threatened release of hazardous substances from the Respondent's facility may present an imminent and substantial endangerment to the public health or welfare or the environment.

B. The actions required by this Order are necessary to protect the public health, welfare and the environment.

C. If performed satisfactorily, the actions required by this Order are consistent with the National Contingency Plan, 40 C.F.R. Part 300 ("NCP").

VII. NOTICE TO THE STATE

Pursuant to Section 106(a) of CERCLA, 42 U.S.C. §9606(a), U.S. EPA has notified the State of California of the issuance of this Order by providing the Regional Board and California Department of Toxic Substances Control a copy of this Order.

VIII. WORK TO BE PERFORMED

A. General Provisions

1. All work shall be conducted in accordance with: the applicable portions of the El Monte Operable Unit Interim Remedial Investigation/Feasibility Study Statement of Work dated March 1995 (Attachment A); CERCLA; the NCP; U.S. EPA "Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA" (EPA, October 1988); "Preparation of a U.S. EPA Region 9 Field Sampling Plan for Private and State-Lead Superfund Projects (EPA, April 1990); U.S. EPA Region 9 Guidance for Preparing Quality Assurance Project Plans for Superfund Remedial Projects" (EPA, November 1992); any final amended or superseding versions of such documents provided by U.S. EPA; other applicable U.S. EPA guidance documents; and any report, document or deliverable prepared by U.S. EPA because Respondent fails to comply with this Order.

2. All plans, schedules, and other reports that require U.S. EPA's approval and are submitted by Respondent pursuant to this Order are incorporated into this Order upon approval by U.S. EPA.

3. All work performed by or on behalf of Respondent pursuant to this Order shall be performed by qualified individuals and/or contractors with expertise in hazardous waste site investigation. The qualifications of the persons, contractors, and subcontractors undertaking the work for Respondent shall be subject to U.S. EPA review.

4. U.S. EPA will oversee Respondent's activities as specified in Section 104(a)(1) of CERCLA Section, 42 U.S.C.

§9604(a)(1). Respondent will support U.S. EPA's initiation and conduct of activities carried out in its oversight responsibilities.

5. To provide quality assurance, maintain quality control, and satisfy chain of custody requirements, Respondent shall: (a) use a laboratory which has a documented Quality Assurance Program that complies with U.S. EPA guidance (EPA, September 1989); and (b) ensure that the laboratory used by Respondent for analysis performs such analyses according to a method or methods approved by U.S. EPA in the Field Sampling Plan and/or Quality Assurance Project Plan to be submitted by Respondent.

B. Work and Deliverables

1. Based on the Findings of Fact, Conclusions of Law, and Determinations, U.S. EPA hereby orders Respondent to perform the following work under the direction of the U.S. EPA's Remedial Project Manager, and to comply with all the requirements of this Order. Respondent will:

a. perform spinner logging and depth-specific sampling of the CCPC production well (Watermaster recordation number 8000012 (hereinafter referred to as the "Crown City Well")); and

b. install and sample monitoring wells MW2-3 and MW2-4 the approximate locations of which will be at the southern boundary of the El Monte operable unit and the exact locations of which shall be subject to U.S. EPA's approval.

Respondent will furnish all personnel, materials, and services

needed, or incidental to, performing the Investigation, except as otherwise specified in the Order.

2. Respondent shall initiate activities necessary to satisfy the following objectives:

a. assess aquifer characteristics and characterize the vertical and lateral distribution of concentrations of volatile organic compounds (VOCs) in groundwater in the vicinity of the Crown City Well;

b. assess aquifer characteristics and characterize the lateral distribution of concentrations of VOCs in groundwater in the vicinity of shallow monitoring well numbers MW2-3 and MW2-4.

3. Respondent will maintain field and laboratory records and reports, including field logs, sample shipment records, analytical results, and quality assurance reports, to ensure that only validated analytical data are reported to and utilized by U.S. EPA. Field logs must be utilized to document observations, measurements, and significant events that occur during field activities. Laboratory reports must document sample custody, analytical responsibility, analytical results, adherence to prescribed protocols, nonconformity events, corrective measures, and/or data deficiencies. In addition, Respondent will establish a data security system to safeguard chain-of-custody forms and other project records to prevent loss, damage, or alteration of project documentation.

4. Respondent will:

a. provide notification to U.S. EPA as described below;

b. prepare a Field Sampling Plan ("FSP");

c. prepare a Quality Assurance Project Plan ("QAPP");

d. prepare a Health & Safety Plan;

e. prepare a Field Work Report on the Spinner Logging and Depth Specific Sampling of the Crown City Plating Co. Production Well; and

f. prepare a Field Work Report on the Installation and Sampling of Shallow Wells MW2-3 and MW2-4.

These documents and actions are necessary to ensure that sample collection and analytical activities are conducted in accordance with technically acceptable protocols, that data quality objectives are established and met, and to otherwise meet the requirements of this Order. The Field Sampling Plan, Quality Assurance Project Plan, and Health and Safety Plan may be submitted separately or as a single document. These tasks are described below.

5. Respondent shall notify U.S. EPA in writing of the name, title and qualifications of the individual(s) who will be responsible for carrying out the terms of this Order, and the name(s) of all contractors or subcontractors. Notification will be provided within fourteen (14) days after the Effective Date of this Order.

6. If U.S. EPA disapproves in writing of any person's

or contractor's technical and/or experience qualifications, U.S. EPA will notify Respondent in writing, and Respondent shall subsequently notify U.S. EPA within fourteen (14) days of Respondent's receipt of U.S. EPA's written notice, of the identity and qualifications of the replacement(s). A subsequent U.S. EPA disapproval of the replacement(s) shall be deemed a failure to comply with the Order.

7. Subsequent to approval by U.S. EPA of the individuals, contractors, or subcontractors who will be responsible for the investigation, Respondent may propose that different individuals, contractors and/or subcontractors direct and supervise the work required by this Order. If Respondent wishes to propose such a change, Respondent shall notify EPA in writing of the name, title, and qualifications of the proposed individuals and the names of proposed contractors and/or subcontractors. Any such individual, contractors and/or subcontractors shall be subject to approval by U.S. EPA. U.S. EPA shall give Respondent its approval or disapproval within fourteen (14) days of receiving from Respondent the information required by this paragraph. The naming of any replacement(s) by Respondent shall not relieve Respondent of any of its obligations to perform the work required by this Order. A subsequent U.S. EPA disapproval of the replacement(s) shall be deemed a failure to comply with the Order.

8. Respondent shall prepare a Field Sampling Plan ("Sampling Plan") in accordance with U.S. EPA guidelines (EPA, April 1990). It will include:

a. a detailed list of tasks to be performed to fulfill the requirements of this Order; and

b. a description of sampling objectives; sample location and frequency including quality control samples, sampling equipment and methodologies; sample handling and analysis; and other aspects of the work to be performed. (Where appropriate, Respondent shall use the protocols and analytical methods addressed in documents included in Attachment B.

9. Respondent may cite relevant portions of the documents listed in Attachment B in the Field Sampling Plan and Quality Assurance Project Plan. Respondent shall evaluate and incorporate into the Field Sampling Plan and/or Quality Assurance Project Plan any necessary protocols and analytical methods that are not addressed in documents included in Attachment B.

10. The Draft Sampling Plan is due on July 21, 1995. The Final Sampling Plan which incorporates U.S. EPA's comments is due within 14 days after Respondent has received U.S. EPA comments on the Draft Sampling Plan. U.S. EPA must review and approve Sampling Plan before any field activity is initiated.

11. Respondent shall prepare a Quality Assurance Project Plan in accordance with U.S. EPA guidelines (EPA, September 1989). It will include (to the extent not included in the Field Sampling Plan):

a. a description of data quality objectives;

b. a description of method(s) used in the investigation to document and record compliance with field and laboratory procedures (e.g., field logs, laboratory reports);

c. information sufficient to demonstrate, to U.S. EPA's satisfaction, that each laboratory used by Respondents is qualified to conduct the proposed work (e.g., ability to meet required detection and quantification limits for chemicals of concern in the media of interest);

d. if the selected laboratory does not participate in U.S. EPA's Contract Laboratory Program ("CLP"), Respondent must submit documentation to demonstrate that the laboratory uses methods consistent with CLP methods and quality assurance requirements (e.g., detailed information to demonstrate the adequacy of the laboratory's quality assurance program; information on personnel qualifications, equipment and material specifications);

e. assurances that U.S. EPA has access to laboratory personnel, equipment and records; and

f. other aspects of quality assurance not addressed in the Field Sampling Plan.

12. Respondent may reference, rather than repeat, information contained in the Field Sampling Plan or in documents listed in Attachment B if the necessary techniques, protocols and quality assurance procedures are already described in those documents.

13. The Draft Quality Assurance Project Plan is due on July 21, 1995. The Final Quality Assurance Project Plan which incorporates U.S. EPA's comments is due within 14 days after Respondent has received U.S. EPA comments on the Draft Quality Assurance Project Plan. U.S. EPA must review and approve the

Quality Assurance Project Plan before any field activity is initiated.

14. Respondent shall prepare a Health and Safety Plan in conformance with Respondent's health and safety program, and in compliance with Occupational Safety & Health Act ("OSHA") regulations and protocols. The Health and Safety Plan will include the eleven (11) elements described in U.S. EPA Guidance (EPA, October 1988), such as a health and safety risk analysis, a description of monitoring and personal protective equipment, and medical monitoring.

15. The Health & Safety Plan is due on July 21, 1995.

16. Within 24 hours of notification of approval of Sampling Plan and Quality Assurance Project Plan by U.S. EPA, respondent will start spinner logging and depth-specific sampling of the Crown City Well.

17. Respondent will notify U.S. EPA of field activities at least one week before initiating sampling so that U.S. EPA may adequately schedule oversight tasks.

18. Respondent will complete spinner logging and depth-specific sampling of Crown City Well within 14 days after start of field work and will notify U.S. EPA in writing upon completion of spinner logging and depth-specific sampling of Crown City Well.

19. Respondent will prepare a draft Field Work report on the spinner logging and depth specific sampling of the Crown City Well describing the results of the spinner logging and depth-specific sampling. The draft Field Work report is due

within fourteen (14) days after completing spinner logging and depth specific sampling of Crown City Well.

20. The final Field Work Report on the spinner logging and depth-specific sampling of the Crown City Well, which incorporates U.S. EPA's comments, is due within 14 days of Respondent's receipt of U.S. EPA comments on the Draft Field Work Report.

21. Respondent will start field work on the installation and sampling of the two (2) shallow wells, MW2-3 and MW2-4, within 35 days following the start of the field work on the spinner logging and depth-specific sampling of the Crown City Well.

22. Respondent will notify U.S. EPA of field activities at least one week before initiating field work so that U.S. EPA may adequately schedule oversight tasks.

23. Respondent will complete installation and initial sampling of the two (2) shallow wells within 14 days after start of field work and notify U.S. EPA in writing upon completion of such work. Sampling of the two (2) shallow wells shall be for one year and include four quarterly rounds (the initial sampling is the first quarterly round) which shall be coordinated with the state and local agencies.

24. Respondent will prepare a draft Field Work report on the installation and sampling of the two (2) shallow wells within fourteen (14) days of completing the installation and sampling of the two (2) shallow wells.

25. The final Field Work Report on the installation

and sampling of the two (2) shallow wells, which incorporates U.S. EPA's comments, is due within 14 days of Respondent's receipt of U.S. EPA's comments on the draft Field Work Report.

26. The Field Work Report shall document the field work performed, including the shallow wells installation and spinner logging and depth-specific sampling of the Crown City Well. The Field Work Report shall describe and display data which document the results of the well installation, including the vertical stratigraphy encountered and extent of contamination at monitoring wells. The Field Work Report shall describe and display data which document the results of spinner logging and depth-specific sampling of the Crown City Well, including static conditions, calculations of zones that produce water, and calculations of concentrations in each producing zone. The Field Work report shall include at a minimum the following:

- a. well construction as-built diagrams that describe the wells as they were installed in the field;
- b. maps showing the locations of wells installed and tested;
- c. survey data for new well locations (both horizontal coordinates and wellhead elevations);
- d. geologic logs describing the sediment encountered during drilling, with sediments described according to American Society for Testing and Material D 2488-84, "Visual Manual procedure for Description and Identification of Soil";
- e. laboratory reports from chemical analyses;
- f. summary tables of detected concentrations;

- g. written description of all field activities;
- h. copies of all geophysical logs conducted during field work;
- i. analysis of spinner logging data, including the calculation of zones that produce water during pumping, and concentrations of VOCs in each producing zone;
- j. analysis of hydraulic conductivity from the spinner logging tests; and
- k. description of waste analysis and disposal activities.

27. With the exception of the Health & Safety Plan, U.S. EPA shall review, comment, and approve or disapprove each plan, report, or other deliverable submitted by Respondents. All U.S. EPA comments on draft deliverables shall be incorporated by Respondent. U.S. EPA shall notify Respondent in writing of EPA's approval or disapproval of a final deliverable. In the event of any disapproval, U.S. EPA shall specify the reasons for such disapproval, U.S. EPA's required modifications, and a time frame for submission of the revised report, document, or deliverable. If the modified report, document or deliverable is again disapproved by U.S. EPA, U.S. EPA shall first notify Respondent and then may draft its own report, document or deliverable and incorporate it as part of this Order, and/or seek penalties from Respondent for failing to comply with this Order, and/or conduct the remaining work required by this Order.

28. All documents, including technical reports, and other correspondence to be submitted by Respondent pursuant to

this Order, shall be sent by over-night mail to the following addressees or to such other addressees as U.S. EPA hereafter may designate in writing, and shall be deemed submitted on the date received by U.S. EPA. Respondent shall submit two (2) copies of each document to U.S. EPA, one copy to the Regional Board, two (2) copies to Department of Toxic Substances Control, and one copy to CH2M Hill.

29. The two copies of each document to be submitted to U.S. EPA shall be sent to:

Bella Dizon
Remedial Project Manager (H-6-5)
Hazardous Waste Management Division
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105
Phone: (415) 744-2155

One copy shall be sent to:

Hank Yacoub
California Regional Water Quality Control Board
101 Centre Plaza Drive
Monterey Park, CA 91754

Two copies shall be sent to:

Mike Sorenson
California Department of Toxic Substances Control
P.O. Box 942732
Sacramento, CA 94234-7320

One copy shall be sent to:

Jonathan Harris
CH2M Hill
2510 Red Hill Avenue, Suite A
Santa Ana, CA 92705

IX. SAMPLING, ACCESS, AND DATA/DOCUMENT AVAILABILITY

A. At the request of U.S. EPA, Respondent shall provide to U.S. EPA and/or its authorized representatives split samples or

duplicates of samples collected by Respondent as part of the investigation.

B. Nothing in this Order shall be interpreted as limiting U.S. EPA's inspection or information-gathering authority under federal law.

C. U.S. EPA personnel and/or U.S. EPA authorized representatives shall be allowed access to the laboratory and personnel used by Respondent for laboratory analyses.

D. For purposes of this Order, U.S. EPA's authorized representatives shall include, but not be limited to, staff of the RWQCB, Department of Toxic Substances Control, and consultants and contractors hired by U.S. EPA to oversee activities required by this Order.

X. OTHER APPLICABLE LAWS

A. Respondent shall undertake all actions required by this Order in accordance with the requirements of all applicable local, state, and federal laws and regulations unless an exemption from such requirements is specifically provided under CERCLA or unless Respondent obtains a variance or exemption from the appropriate governmental authority.

B. Any materials removed from the Site shall be disposed of or treated at a facility in accordance with Section 121(d)(3) of CERCLA, 42 U.S.C. §9621(d)(3), U.S. EPA's Revised Off-Site Policy, and all other applicable Federal, State and local requirements.

XI. RECORD PRESERVATION

Respondent shall maintain, during the pendency of this Order

and for a minimum of twenty (20) years after U.S. EPA provides notice to Respondent that the work has been completed, a central depository of the records and documents required to be prepared under this Order. In addition, Respondent shall retain copies of the most recent version of all documents that relate to hazardous substances at the Site and that are in its possession or in the possession of its employees, agents, contractors, or attorneys. After this twenty year period, Respondent shall notify U.S. EPA at least thirty (30) days before the documents are scheduled to be destroyed. If U.S. EPA so requests, Respondent shall provide these documents to U.S. EPA.

XII. DESIGNATED PROJECT MANAGERS

A. U.S. EPA designates Bella Dizon, an employee of Region 9 of U.S. EPA, as its Remedial Project Manager ("RPM") who shall have the authorities, duties, and responsibilities vested in the RPM by the NCP. Within fifteen (15) days of the Effective Date of this Order, Respondent shall designate a Project Coordinator who shall be responsible for overseeing Respondent's implementation of this Order. The U.S. EPA RPM will be U.S. EPA's designated representative at the Facility. To the maximum extent possible, all oral communications between Respondent and U.S. EPA concerning the activities performed pursuant to this Order shall be directed through U.S. EPA's RPM and Respondent's Project Coordinator. All documents, including progress and technical reports, approvals, and other correspondence concerning the activities performed pursuant to the terms and conditions of this Order, shall be delivered in accordance with Paragraph VIII

B.22.

B. U.S. EPA and Respondent may change their respective RPM and Project Coordinator. Such a change shall be accomplished by notifying the other party in writing at least seven (7) days prior to the change except in the case of an emergency, in which case notification shall be made orally followed by written notification as soon as possible.

C. Consistent with the provisions of this Order, the U.S. EPA RPM shall also have the authority vested in the On-Scene Coordinator ("OSC") by the NCP, unless U.S. EPA designates a separate individual as OSC, who shall then have such authority. This includes, but is not limited to, the authority to halt, modify, conduct, or direct any tasks required by this Order and/or undertake any response actions (or portions of the response action) when conditions present or may present a threat to public health or welfare or the environment as set forth in the NCP.

D. The absence of the U.S. EPA RPM or the OSC from the Site shall not be cause for the stoppage of work. Nothing in this Order shall limit the authority of the U.S. EPA RPM or OSC under federal law.

XIII. MODIFICATION OF WORK REQUIRED

A. In the event of unanticipated or changed circumstances at the facility, Respondent shall notify the U.S. EPA RPM by telephone within twenty-four (24) hours of discovery of the new or changed circumstances. This verbal notification shall be followed by written notification postmarked within three (3) days

of discovery of the new or changed circumstances.

B. The Director, Hazardous Waste Management Division may determine that in addition to tasks addressed herein, additional work may be required. Where consistent with Section 106(a) of CERCLA, the Director, Hazardous Waste Management Division may direct as an amendment to this Order that Respondent perform these response actions in addition to those required herein by any plan. Respondent shall implement the additional tasks which the Director, Hazardous Waste Management Division identifies. The additional work shall be completed according to the standards, specifications, and schedules set forth by the Director, Hazardous Waste Management Division identifies.

XIV. SITE ACCESS

A. Respondent shall permit U.S. EPA and its authorized representatives to have access at all times to the Site to monitor any activity conducted pursuant to this Order to conduct such tests or investigations as U.S. EPA deems necessary. Nothing in this Order shall be deemed a limit upon U.S. EPA's authority under federal law to gain access to the Site.

B. To the extent that Respondent requires access to land other than land it owns in carrying out the terms of this Order, Respondent shall, within ninety (90) days of the Effective Date of this Order, obtain access for U.S. EPA, its contractors and oversight officials; state oversight officials and state contractors; and Respondent or its authorized representatives. If Respondent fails to gain access within ninety (90) days, it shall continue to use best efforts to obtain access until access is

granted. For purposes of this paragraph, "best efforts" includes but is not limited to, seeking judicial assistance, providing indemnification, and/or the payment of money as consideration for access. If access is not provided within the time referenced above, U.S. EPA may obtain access under Sections 104(e) or 106(a) of CERCLA.

XV. DELAY IN PERFORMANCE

A. Any delay in performance of this Order that, in the U.S. EPA's judgment, is not properly justified by Respondent under the terms of this Section shall be considered a violation of this Order. Any delay in performance of this Order shall not affect Respondent's obligations to fully perform all obligations under the terms and conditions of this Order.

B. Respondent shall notify U.S. EPA of any delay or anticipated delay in performing any requirement of this Order. Such notification shall be made by telephone to U.S. EPA's RPM within twenty-four (24) hours after Respondent first knew or should have known that a delay might occur. Respondent shall adopt all reasonable measures to avoid or minimize any such delay. Within three (3) days after notifying U.S. EPA by telephone, Respondent shall provide written notification fully describing the nature of the delay, any justification for delay, any reason why Respondent should not be held strictly accountable for failing to comply with any relevant requirements of this Order, the measures planned and taken to minimize the delay, and a schedule for implementing the measures that will be taken to mitigate the effect of the delay. Increased costs or expenses

associated with implementation of the activities called for in this Order are not justifications for any delay in performance.

C. *If Respondent are unable to perform any activity or submit any document within the time required under this Order, Respondent may, prior to the expiration of the time, request an extension of time in writing. The extension request shall include a justification for the delay. Submission of an extension request shall not affect Respondent's obligation to comply with the requirements of this Order.

D. If U.S. EPA determines that good cause exists for an extension of time, it may grant a request made pursuant to Subparagraph C, above, and specify in writing a new schedule for completion of the activity and/or submission of the document.

XVI. ENDANGERMENT AND EMERGENCY RESPONSE

A. In the event of any action or occurrence during the performance of the work which causes or threatens to cause a release of a hazardous substance or which may present an immediate threat to public health or welfare or the environment, Respondents shall immediately take all appropriate action to prevent, abate, or minimize the threat, and shall immediately notify U.S. EPA's RPM, or, if the RPM is unavailable, U.S. EPA's OSC. If neither of these persons is available, Respondent shall notify the U.S. EPA Emergency Response Unit, Region 9, phone number (415) 744-2000. Respondent shall take such action in consultation with U.S. EPA's RPM and in accordance with all applicable provisions of this Order, including but not limited to the Health and Safety Plan.

*

B. Nothing in the preceding paragraph shall be deemed to limit any authority of the United States to take, direct, or order all appropriate action to protect human health and the environment or to prevent, abate, or minimize an actual or threatened release of hazardous substances on, at, the Site.

XVII. ASSURANCE OF ABILITY TO COMPLETE WORK

A. Respondent shall demonstrate their ability to complete the work required by this Order and to pay all claims that arise from the performance of the work by obtaining and presenting to U.S. EPA within thirty (30) days of the Effective Date of this Order, one of the following: (1) a performance bond; (2) a letter of credit; (3) a guarantee by a third party; or (4) internal financial information to allow U.S. EPA to determine that Respondent have sufficient assets available to perform the work. Respondent shall demonstrate financial assurance in an amount no less than the estimate of cost for the remedial investigation. If Respondent seeks to demonstrate ability to complete the remedial investigation by means of internal financial information, or by guarantee of a third party, Respondent shall re-submit such information every six months from the Effective Date of this Order. If U.S. EPA determines that such financial information is inadequate, Respondent shall, within fifteen (15) days after receipt of U.S. EPA's notice of determination, obtain and present to U.S. EPA for approval on the other forms of financial assurance listed above.

B. At least seven (7) days prior to commencing any work at the Site pursuant to this Order, Respondent shall submit to U.S.

EPA a certification that Respondent or its contractors and subcontractors have adequate insurance coverage or has indemnification for liabilities for injuries or damages to persons or property which may result from the activities to be conducted by or on behalf of Respondent pursuant to this Order. Respondent shall ensure that such insurance or indemnification is maintained for the duration of performance of the work required by this Order.

XVIII.DISCLAIMER

The United States, by issuance of this Order, assumes no liability for any injuries or damages to persons or property resulting from acts or omissions by Respondent, or its employees, agents, successors, assigns, contractors, or consultants in carrying out any action or activity pursuant to this Order. Neither U.S. EPA nor the United States shall be held as a party to any contract entered into by Respondent, or its employees, agents, successors, assigns, contractors, or consultants in carrying out any action or activity pursuant to this Order.

XIX. ENFORCEMENT AND RESERVATIONS

A. U.S. EPA reserves the right to bring an action against Respondent under Section 107 of CERCLA, 42 U.S.C. §9607, for recovery of any response costs incurred by the United States related to this Order and not reimbursed by Respondent. This reservation shall include but not be limited to past costs, direct costs, indirect costs, the costs of oversight, the costs of compiling the cost documentation to support oversight cost demand, as well as accrued interest as provided in Section 107(a)

of CERCLA, 42 U.S.C. §9607.

B. Notwithstanding any other provision of this Order, at any time during the response action, U.S. EPA may perform its own studies, complete the response action (or any portion of this response action) and seek reimbursement from Respondent for its costs, or seek any other appropriate relief.

C. Nothing in this Order shall preclude U.S. EPA from taking any additional enforcement action, including modification of this Order or issuance of additional Orders, and/or additional remedial or removal actions as U.S. EPA may deem necessary, or from requiring Respondent in the future to perform additional activities pursuant to CERCLA, 42 U.S.C. §9607(a), et seq., or any other applicable law. Respondent shall be liable under CERCLA Section 107(a), 42 U.S.C. §9607(a), for the costs of any such additional actions.

D. Notwithstanding any provision of this Order, the United States hereby retains all of its information gathering, inspection and enforcement authorities and rights under CERCLA, the Resource Conservation and Recovery Act, or any other applicable statutes or regulations.

E. Respondent shall be subject to civil penalties under Section 106(b) of CERCLA, 42 U.S.C. §9606(b), of not more than \$25,000 for each day in which Respondent willfully violates or fails to comply with the requirements of this Order. In addition, failure to take response action in compliance with this Order, or any portion hereof, without sufficient cause, may result in liability under Section 107(c)(3) of CERCLA, 42 U.S.C.

§9607(c)(3), for punitive damages in an amount at least equal to, and not more than three (3) times the amount of any costs incurred by the Hazardous Substance Superfund, as a result of such failure to comply.

F. Notwithstanding compliance with the terms of this Order, including the completion of an U.S. EPA-approved remedial investigation, Respondent is not released from liability, if any, for any enforcement actions beyond the terms of this Order taken by U.S. EPA.

G. U.S. EPA reserves the right to take any enforcement action pursuant to CERCLA and/or any other legal authority, including the right to seek injunctive relief, monetary penalties, reimbursement of response costs, and punitive damages for any violation of law or this Order.

H. U.S. EPA expressly reserves all rights and defenses that it may have, including the U.S. EPA's right both to disapprove of work performed by Respondent and to request that Respondent perform tasks in addition to those detailed in this Order, as provided in Section VIII (Work to be Performed) of this Order. U.S. EPA reserves the right to undertake removal actions and/or remedial actions at any time. U.S. EPA reserves the right to seek reimbursement from Respondent for the costs incurred by the United States in removal and remedial actions.

I. This Order does not release Respondent from any claim, cause of action or demand in law or equity, including, but not limited to, any claim, cause of action, or demand which lawfully may be asserted by representatives of the United States or the

State of California.

J. No informal advice, guidance, suggestions, or comments by U.S. EPA regarding reports, plans, specifications, schedules, and any other writing submitted by Respondent will be construed as relieving Respondent of its obligation to obtain such formal approval as may be required by this Order.

XX. REIMBURSEMENT OF OVERSIGHT COSTS

A. Respondent shall reimburse U.S. EPA, upon written demand, for all response costs incurred by the United States in overseeing Respondent's implementation of the requirements of this Order. U.S. EPA may submit to Respondent on a periodic basis a bill for all response costs incurred by the United States with respect to this Order. Respondent shall, within thirty (30) days of receipt of the bill, remit by cashiers or certified check for the amount of those costs made payable to the "Hazardous Substance Superfund," to the following address:

U.S. Environmental Protection Agency
Region 9, Attn: Superfund Accounting
P.O. Box 360863M
Pittsburgh, PA 15251

Respondent shall send a cover letter with any check and the letter shall identify the EMOU, San Gabriel Valley Superfund Sites by name and make reference to this Order. Respondent shall send simultaneously to the U.S. EPA RPM notification of any amount paid, including a photocopy of the check.

B. Interest at the rate established under section 107(a) of CERCLA shall begin to accrue on the unpaid balance from the day of the original demand notwithstanding any dispute or

objection to any portion of the costs.

XXI. NOTICE OF INTENT TO COMPLY

Respondent shall, within two (2) days of the Effective Date of this Order, provide written notice to U.S. EPA of Respondent's irrevocable intent to comply with this Order. Failure to respond, or failure to agree to comply with this Order, shall be deemed a refusal to comply with this Order.

XXII. OPPORTUNITY TO CONFER

A. Respondent may, within three (3) days of receipt of this Order, request a conference with Chief, Remedial Action Branch Hazardous Waste Management Division, or whomever the Chief may designate. If requested, the conference shall occur within three (3) days of the request, unless extended by mutual agreement of the Parties, at U.S. EPA's Regional Office, 75 Hawthorne Street, San Francisco, California.

B. At any conference held pursuant to Respondent's request, Respondent may appear in person, or be represented by an attorney or other representative. If Respondent desires such a conference, Respondent shall contact Mark Klaiman, Assistant Regional Counsel, at (415) 744-1374.

C. The purpose and scope of any such conference held pursuant to this Order shall be limited to issues involving the implementation of the response actions required by this Order and the extent to which Respondent intend to comply with this Order. If such a conference is held, Respondent may present any evidence, arguments or comment regarding this Order, its applicability, any factual determinations upon which the Order is

based, the appropriateness of any action which Respondent is ordered to take, or any other relevant and material issue. Any such evidence, arguments or comments should be reduced to writing and submitted to U.S. EPA within three (3) days following the conference. This conference is not an evidentiary hearing, and does not constitute a proceeding to challenge this Order. It does not give Respondent a right to seek review of this Order, or to seek resolution of potential liability, and no official stenographic record of the conference will be made. If no conference is requested, any such evidence, arguments or comments must be submitted in writing within three (3) days following the Effective Date of this Order. Any such writing should be directed to Mark Klaiman, Assistant Regional Counsel, at the address cited above.

D. Respondent is hereby placed on notice that U.S. EPA will take any action which may be necessary in the opinion of U.S. EPA for the protection of public health and welfare and the environment, and Respondent may be liable under Section 107(a) of CERCLA, 42 U.S.C. Section 9607(a), for the costs of those government actions.

XXIII. SEVERABILITY

If any provision or authority of this Order or the application of this Order to any circumstance is held by a court to be invalid, the application of such provision to other circumstances and the remainder of this Order shall not be affected thereby, and the remainder of this Order shall remain in force.

XXIV. PENALTIES FOR NONCOMPLIANCE

Respondents are advised pursuant to Section 106(b) of CERCLA, 42 U.S.C. Section 9606(b), that willful violation or subsequent failure or refusal to comply with this Order, or any portion thereof, may subject Respondent to a civil penalty of up to \$25,000 per day for each day in which such violation occurs, or such failure to comply continues. Failure to comply with this Order, or any portion thereof, without sufficient cause may also subject Respondents to liability for punitive damages in an amount three times the amount of any cost incurred by the government as a result of the failure of Respondent to take proper action, pursuant to Section 107(c)(3) of CERCLA, 42 U.S.C. Section 9607(c)(3).

XXV. EFFECTIVE DATE

This Order is effective three (3) days following receipt by Respondent unless a conference is requested as provided herein. If such a conference is requested, this Order shall be effective the second (2nd) day following the day of such conference unless modified in writing by U.S. EPA.

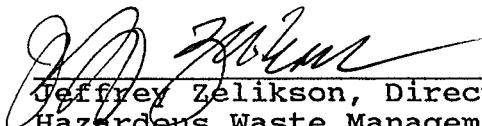
XXVI. TERMINATION AND SATISFACTION

The provisions of this Order shall be deemed satisfied upon Respondent's receipt of written notice from U.S. EPA that Respondent has demonstrated, to the satisfaction of U.S. EPA, that all of the terms of this Order, including any additional tasks which U.S. EPA has determined to be necessary, have been completed.

IT IS SO ORDERED:

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY

By:



Jeffrey Zelikson, Director
Hazardous Waste Management Division
Region 9

Date:

5-31-75

EPA Region 9 Contacts:

Bella Dizon
Remedial Project Manager (H-6-5)
Hazardous Waste Management Division
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 744-2155

Mark Klaiman
Assistant Regional Counsel
Office of Regional Counsel
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 744-1374

ATTACHMENT B

The following list, although not comprehensive, comprises many of the regulations and guidance documents that apply to the Investigation process:

The (revised) National Contingency Plan

"Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA," U.S. EPA, Office of Emergency and Remedial Response, October 1988, OSWER Directive No. 9355.3-01.

"Interim Guidance on Potentially Responsible Party Participation in Remedial Investigation and Feasibility Studies," U.S. EPA, Office of Waste Programs Enforcement, Appendix A to OSWER Directive No. 9355.3-01.

"A Compendium of Superfund Field Operations Methods," Two Volumes, U.S. EPA, Office of Emergency and Remedial Response, EPA/540/P-87/001a, August 1987, OSWER Directive No. 9355.0-14.

"EPA NEIC Policies and Procedures Manual," May 1978, revised November 1984, EPA-330/9-78-001-R.

"Data Quality Objectives for Remedial Response Activities," U.S. EPA, Office of Emergency and Remedial Response and Office of Waste Programs Enforcement, EPA/540/G-87/003, March 1987, OSWER Directive No. 9335.0-7B.

"U.S. EPA Region 9 Guidance for Preparing Quality Assurance Project Plans for Superfund Remedial Projects," 9QA-03-00, U.S. EPA Region 9 QAMs, September 1989.

"Users Guide to the EPA Contract Laboratory Program," U.S. EPA, Sample Management Office, August 1982.

"Health and Safety Requirements of Employees Employed in Field Activities," U.S. EPA, Office of Emergency and Remedial Response, July 12, 1981, EPA Order No. 1440.2.

OSHA Regulations in 29 CFR 1910.120 (Federal Register 45654, December 19, 1986).

Preparation of a U.S. EPA Region 9 Field Sampling Plan for Private and State-Lead Superfund Projects, Document Control Number 9QA-06-89, April 1990, U.S. EPA Region 9, Quality Assurance Management Section.

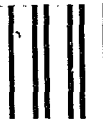
STICK POSTAGE STAMPS TO ARTICLE TO COVER FIRST CLASS POSTAGE, CERTIFIED MAIL FEE, AND CHARGES FOR ANY SELECTED OPTIONAL SERVICES (see front).

1. If you want this receipt postmarked, stick the gummed stub to the right of the return address leaving the receipt attached and present the article at a post office service window or hand it to your rural carrier (no extra charge).
2. If you do not want this receipt postmarked, stick the gummed stub to the right of the return address of the article, date, detach and retain the receipt, and mail the article.
3. If you want a return receipt, write the certified mail number and your name and address on a return receipt card, Form 3811, and attach it to the front of the article by means of the gummed ends if space permits. Otherwise, affix to back of article. Endorse front of article **RETURN RECEIPT REQUESTED** adjacent to the number.
4. If you want delivery restricted to the addressee, or to an authorized agent of the addressee, endorse **RESTRICTED DELIVERY** on the front of the article.
5. Enter fees for the services requested in the appropriate spaces on the front of this receipt. If return receipt is requested, check the applicable blocks in item 1 of Form 3811.
6. Save this receipt and present it if you make inquiry.

U.S. GPO: 1991-302-916

UNITED STATES POSTAL SERVICE

Official Business



PENALTY FOR PRIVATE
USE TO AVOID PAYMENT
OF POSTAGE, \$300



Print your name, address and ZIP Code here

Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105-3901

ATTN: BELLA DIZON, H-6-5

Is your RETURN ADDRESS completed on the reverse side?

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

ROBERT COOMBS, SR.
4350 TEMPLE CITY, BLVD.
EL MONTE, CA 91731
(CROWN CITY PLATING CO.)

4a. Article Number

P-243-066-969

4b. Service Type

- ☐ Registered ☐ Insured
☒ Certified ☐ COD
☐ Express Mail ☐ Return Receipt for Merchandise

7. Date of Delivery

6/2/95

5. Signature (Addressee)

8. Addressee's Address (Only if requested and fee is paid)

6. Signature (Agent)

Robert Coombs

PS Form 3811, December 1991

★U.S. GPO: 1993-352-714

DOMESTIC RETURN RECEIPT

Thank you for using Return Receipt Service.

P 243 066 969



**Receipt for
Certified Mail**

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	ROBERT COOMBS, SR.
Street and No.	CROWN CITY PLATING CO.
P.O., State and ZIP Code	4350 TEMPLE CITY BLVD EL MONTE, CA 91731
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, June 1991